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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 RYAN WILSON,

15 Defendant.
16

Case No. 1:21-cr-00315-DAD-BAM

**STIPULATION TO CONTINUE STATUS
CONFERENCE; AND ORDER**

Date: May 11, 2022

Time: 1:00 p.m.

Judge: Hon. Barbara A. McAuliffe

17 IT IS HEREBY STIPULATED by and between the parties through their respective
18 counsel, Assistant United States Attorney Kimberly Sanchez, counsel for plaintiff, and Assistant
19 Federal Defender Reed Grantham, counsel for Ryan Wilson, that the status conference currently
20 scheduled for February 9, 2022, at 1:00 p.m. may be continued to May 11, 2022, at 1:00 p.m.

21 Mr. Wilson made his initial appearance in this matter on December 15, 2021. *See* Dkt.
22 #4. An Indictment issued on December 16, 2021. *See* Dkt. #9. On December 20, 2021, the matter
23 was set for a first status conference to occur on February 9, 2022. *See* Dkt. #11.

24 On May 13, 2020, this Court issued General Order 618, which extended the previous
25 restrictions on courthouse access and in-court hearings until further notice from the Court. This
26 General Order was entered to address public health concerns related to COVID-19. By this
27 stipulation, the parties now move to continue the current status conference until May 11, 2022,
28 and to exclude time between February 9, 2022, and May 11, 2022, under 18 U.S.C. §§

1 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv).

2 The parties agree and stipulate, and request that the Court find the following. The
3 government has provided initial discovery in this matter. The defense has requested additional
4 discovery and the government is in the process of providing the requested discovery. The
5 defense remains in the process of reviewing the discovery with his client and is conducting
6 further investigation. For the above reasons, the defense requires additional time to discuss the
7 case with his client, to conduct any further investigation and research, and to participate in any
8 plea negotiation discussions with the government.

9 The requested continuance will conserve time and resources for the parties and the Court.
10 Counsel for defendant believes that failure to grant the above-requested continuance would deny
11 him the reasonable time necessary for effective preparation, taking into account the exercise of
12 due diligence. The government does not object to the continuance.

13 Based on the above-stated findings, the ends of justice served by continuing the case as
14 requested outweigh the interest of the public and the defendant in a trial within the original date
15 prescribed by the Speedy Trial Act. For the purpose of computing time under the Speedy Trial
16 Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of February 9,
17 2022, to May 11, 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A)
18 and 3161(h)(7)(B)(i), (ii) and (iv) because it results from a continuance granted by the Court at
19 defendant's request on the basis of the Court's finding that the ends of justice served by taking
20 such action outweigh the best interest of the public and the defendant in a speedy trial.

21
22 Respectfully submitted,

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24 PHILLIP A. TALBERT
United States Attorney

25 Date: February 3, 2022

26 /s/ Kimberly Sanchez
27 KIMBERLY SANCHEZ
Assistant United States Attorney
Attorney for Plaintiff

28 HEATHER E. WILLIAMS
Federal Defender

1 Date: February 3, 2022

/s/ Reed Grantham

2 REED GRANTHAM
3 Assistant Federal Defender
4 Attorney for Defendant
5 RYAN WILSON

6 **ORDER**

7 **IT IS SO ORDERED.** The status conference currently scheduled for February 9, 2022,
8 at 1:00 p.m. is hereby continued to **May 11, 2022, at 1:00 p.m. before Magistrate Judge**
9 **Barbara A. McAuliffe**. The time period of the date of this order to May 11, 2022, inclusive, is
10 deemed excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv)
11 because it results from a continuance granted by the Court at defendant's request on the basis of
12 the Court's finding that the ends of justice served by taking such action outweigh the best interest
13 of the public and the defendant in a speedy trial.

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15 IT IS SO ORDERED.

16 Dated: February 3, 2022

/s/ Barbara A. McAuliffe

17 UNITED STATES MAGISTRATE JUDGE
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